

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE THE CHEMOURS
COMPANY STOCKHOLDER
DERIVATIVE LITIGATION

This Document Relates To:

ALL ACTIONS.

Lead C.A. No.: 1:20-cv-00989-CFC

(Consolidated with C.A. No. 1:20-cv-00995-CFC)

**STIPULATION OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE AND [PROPOSED] ORDER**

WHEREAS, on August 14, 2020, the Court consolidated two stockholder derivative actions filed by plaintiffs Brason Lee and Lesley Savage (collectively, the "Plaintiffs") against the Individual Defendants,¹ current and former directors and officers of nominal defendant The Chemours Company ("Chemours" or the "Company," and together with the Individual Defendants, the "Defendants"), titled *In Re The Chemours Company Stockholder Derivative Litigation*, Lead C.A. No. 1:20-cv-00989-CFC (the "Derivative Action");

WHEREAS, pursuant to Rules 23.1(c) and 41(a) of the Federal Rules of Civil Procedure, Plaintiffs now wish to voluntarily dismiss the Derivative Action without prejudice;

¹ "Individual Defendants" refer to Mark P. Vergnano, Mark E. Newman, Richard H. Brown, Curtis V. Anastasio, Bradley J. Bell, Mary B. Cranston, Curtis J. Crawford, Dawn L. Farrell, Sean D. Keohane, Erin N. Kane, and Stephen D. Newlin.

WHEREAS, the parties agree that each side shall bear its own costs and fees; and

WHEREAS, the parties respectfully submit that notice of this dismissal to Chemours stockholders pursuant to Federal Rule of Civil Procedure 23.1(c) is not required here because: (i) Defendants have not answered or otherwise responded to the operative complaint; (ii) there has been no settlement or compromise of the Derivative Action; (iii) there has been no collusion among the parties; and (iv) neither Plaintiffs nor their counsel have received or will receive directly or indirectly any consideration from Defendants for the dismissal.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by the parties through their undersigned counsel, pursuant to Rules 23.1(c) and 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and subject to Court approval, that:

1. This Derivative Action is dismissed in its entirety without prejudice;
2. For the reasons stated above, no notice of this dismissal is required; and
3. The parties are to bear their own costs, fees, and expenses.

IT IS SO STIPULATED.

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Stephen D. Newlin, and The Chemours
Company*

IT IS SO ORDERED.

DATED: _____

HON. COLM F. CONNOLLY
U.S.D.C. JUDGE